

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

AMERICAN NATIONAL  
INSURANCE COMPANY,  
Plaintiff,

V.

RUTH A. WILDS and JOAN L. GEIGER,  
Defendants.

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C.A. No. 06-237(KAJ)

## REQUEST FOR PRODUCTION

Ruth A. Wilds requests Joan L. Geiger, to produce for examination and copying at the offices of Donald L. Gouge, Jr., Esquire, Heiman, Gouge & Kaufman, LLP 800 King Street, Suite 303, Wilmington, DE 19801 within thirty (30) days of the date of service hereof the following items:

- (1) Copies of all reports of investigation, findings of fact, observation of facts, or circumstances, or any other matter relating to any aspect of the litigation.
- (2) Copies of any reports by any person qualifying as an expert containing opinions and/or facts on which opinions are based concerning any aspect of the litigation.
- (3) Copies of any and all writings in your possession or available to you identified or referred to in any way in your answers to the accompanying Interrogatories.
- (4) Copies of any and all writings in your possession or available to you in addition to the items specified in previous sections of this Request for Production which pertain in any way to the issues raised by the pleadings herein.

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Donald L. Gouge, Jr. (DSB # 2234)  
800 King Street, Suite 303  
Wilmington, DE 19801  
(302) 658-1800x2  
Attorney for Ruth A. Wilds

Date: November 29, 2006

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## CERTIFICATE OF SERVICE

The undersigned certifies that on the date listed below that Ruth A. Wilds' initials disclosures and first set of discovery was sent to counsel of record and this notice was filed with the Clerk of Court using CM/ECF which will send notification of such filing(s) to the individual(s) noted below. The document is available for viewing and downloading from CM/ECF. I also served a hard copy as indicated below:

John F. Brady, Esquire  
P.O. Box 742  
Georgetown, DE 19947 (U.S. Mail)

HEIMAN, GOUGE & KAUFMAN, LLP

/s/ Donald L. Gouge, Jr. #2234  
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Date: November 29, 2006